

LITE DEPALMA GREENBERG & AFANANDOR, LLC

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Attorney for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HEATHER ALTMAN and ELIZA WIATROSKI,
Individually and on Behalf of All Others Similarly
Situating,

Plaintiffs,

v.

CEASERS ENTERTAINMENT, INC.,
BOARDWALK REGENCY LLC d/b/a CEASERS
ATLANTIC CITY HOTEL & CASINO, HARRAH'S
ATLANTIC CITY OPERATING COMPANY, LLC
d/b/a HARRAH'S RESORT ATLANTIC CITY
HOTEL & CASINO, TROPICANA ATLANTIC
CITY CORPORATION d/b/a TROPICANA CASINO
AND RESORT ATLANTIC CITY, MGM RESORTS
INTERNATIONAL, MARINA DISTRICT
DEVELOPMENT COMPANY, LLC d/b/a
BORGATA HOTEL CASINO & SPA, HARD ROCK
INTERNATIONAL INC., SEMINOLE HARD
ROCK SUPPORT SERVICES, LLC, BOARDWALK
1000, LLC d/b/a HARD ROCK HOTEL & CASINO
ATLANTIC CITY, and CENDYN GROUP, LLC,

Defendants.

Civil Action No.: 1:23-cv-02536-KMW-EAP

**CERTIFICATION OF JOSEPH J.
DEPALMA IN SUPPORT
OF MOTION FOR ADMISSION OF
ATTORNEYS *PRO HAC VICE***

I, Joseph J. DePalma, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey, a member in good standing of the bar of this Court, and a member of the firm of Lite DePalma Greenberg & Afanador, LLC,

located at 570 Broad Street, Suite 1201, Newark, NJ 07102, co-counsel for Plaintiffs Heather Altman and Eliza Wiatroski (“Plaintiffs”) in the captioned matter. As such, I have personal knowledge of the facts set forth herein.

2. I make this Certification in support of Plaintiffs’ application to admit Christopher J. Cormier, Spencer Cox, Warren T. Burns, Daniel H. Charest, Matthew Tripolitsiotis, Hannah M. Crowe and Quinn Burns *pro hac vice* as counsel for Plaintiffs.

3. Christopher J. Cormier is a partner with the firm G Burns Charest LLP, located at 4725 Wisconsin Avenue, NW, Suite 200, Washington, DC 20016.

4. Mr. Cormier has advised me that he is a member in good standing of the bars of the District of Columbia, State of Colorado, State of Virginia, the United States District Court for the District of Colorado, the United States District Court for the District of Columbia, the United States Court of Appeals for the Ninth Circuit, the United States Court of Appeals for the Tenth Circuit and the Supreme Court of the United States. Mr. Cormier is fully familiar with the facts of this case.

5. There is good cause for the *pro hac vice* admission of Mr. Cormier, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

6. Spencer Cox is a partner with the firm Burns Charest, LLP, located at 4725 Wisconsin Avenue, NW, Suite 200, Washington, DC 20016.

7. Mr. Cox has advised me that he is a member in good standing of the bars of the States Texas, Virginia and District of Columbia, the United States District Court for the Eastern District of Virginia, the United States District Court for the Northern District of Texas, the United States District Court for the District of Colorado, the United States District Court for the

District of Columbia, and the United States Court of Appeals for the Tenth Circuit. Mr. Cox is fully familiar with the facts of this case.

8. There is good cause for the *pro hac vice* admission of Mr. Cox, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

9. Warren T. Burns is a partner with the firm Burns Charest, LLP, located at 900 Jackson Street, Suite 500, Dallas, Texas 75202.

10. Mr. Burns has advised me that he is a member in good standing of the bars of the States Texas, the territory of the United States Virgin Islands, New York, the United States District Court for the Northern District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the Southern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the Eastern District of Michigan, the United States District Court for the District of Colorado, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, the United States Court of Federal Claims, the United States Court of Appeals for the First Circuit, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Fifth Circuit, the United States Court of Appeals for the Ninth Circuit, the United States Court of Appeals for the Tenth Circuit, and the United States Court of Appeals for the District of Columbia Circuit. Mr. Burns is fully familiar with the facts of this case.

11. There is good cause for the *pro hac vice* admission of Mr. Burns, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the

proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

12. Daniel H. Charest is a partner with the firm Burns Charest, LLP, located at 900 Jackson Street, Suite 500, Dallas, Texas 75202.

13. Mr. Charest has advised me that he is a member in good standing of the bars of the States of Texas and Virginia, the Courts of the District of Columbia, the territorial courts of the United States Virgin Islands, the United States District Court for the Northern District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the Southern District of Texas, the United States District Court for the Eastern District of Virginia, the United States District Court for the Western District of Virginia, the United States District Court for the District of Columbia, the United States District Court for the District of the United States Virgin Islands, the United States District Court for the District of Colorado, the United States Court of Federal Claims, the United States Court of Appeals for the Fourth Circuit, the United States Court of Appeals for the Fifth Circuit, the United States Court of Appeals for the Ninth Circuit, the United States Court of Appeals for the Tenth Circuit, the United States Court of Appeals for the Federal Circuit. Mr. Charest is fully familiar with the facts of this case.

14. There is good cause for the *pro hac vice* admission of Mr. Charest, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

15. Matthew Tripolitsiotis is a partner with the firm Burns Charest, LLP, located at 900 Jackson Street, Suite 500, Dallas, Texas 75202.

16. Mr. Tripolitsiotis has advised me that he is a member in good standing of the

bars of the States of New York and Connecticut, the United States District Court for the District of Connecticut, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of Michigan, the United States District Court for the District of Colorado, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the Sixth Circuit, and the Supreme Court of the United States. Mr. Tripolitsiotis is fully familiar with the facts of this case.

17. There is good cause for the *pro hac vice* admission of Mr. Tripolitsiotis, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

18. Hannah M. Crowe is an associate with the firm Burns Charest, LLP, located at 900 Jackson Street, Suite 500, Dallas, Texas 75202.

19. Ms. Crowe has advised me that she is a member in good standing of the bars of the State of Texas, the United States District Court for the Northern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the Southern District of Texas, the United States District Court for the District of Colorado. Ms. Crowe is fully familiar with the facts of this case.

20. There is good cause for the *pro hac vice* admission of Ms. Crowe, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by her acting as attorney for Plaintiffs in this matter..

21. Quinn Burns is an associate with the firm Burns Charest, located at 900 Jackson Street, Suite 500, Dallas, Texas 75202.

22. Mr. Burns has advised me that he is a member in good standing of the bars of the State of Texas, the United States District Court for the Northern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the Southern District of Texas. Mr. Burns is fully familiar with the facts of this case.

23. There is good cause for the *pro hac vice* admission of Mr. Burns, as he is familiar with the facts, issues and pleadings in this action and no delay in the conduct of the proceedings would be occasioned by him acting as attorney for Plaintiffs in this matter.

24. Pursuant to Rule 101.1(c)(4) of the Local Civil Rules, my firm will appear in this action, including all court appearances on behalf of Plaintiffs, and agrees to accept service of all notices, orders, and pleadings in this action. I or an attorney from my firm will sign and file all pleadings, enter all appearances, sign all stipulations, and other such documents in this matter. I agree to be responsible for the conduct of the above-named counsel should they be admitted *pro hac vice*.

25. Pursuant to Rule 101.1(c)(4) of the Local Civil Rules, my firm will appear in this action, including all court appearances on behalf of Plaintiffs, and agrees to accept service of all notices, orders, and pleadings in this action. I or an attorney from my firm will sign and file all pleadings, enter all appearances, sign all stipulations, and other such documents in this matter. I agree to be responsible for the conduct of the above-named counsel should they be admitted *pro hac vice*.

26. I will make certain that each attorney to be admitted *pro hac vice* in this case will comply with Local Civil Rule 101.1(c).

27. Accordingly, I respectfully request that this Court enter an Order admitting

Christopher J. Cormier, Spencer Cox, Warren T. Burns, Daniel H. Charest, Matthew Tripolitsiotis, Hannah M. Crowe and Quinn Burns *pro hac vice* in this action.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: June 16, 2023

/s/ Joseph J. DePalma
Joseph J. DePalma